UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS **BROWNSVILLE DIVISION**

United States District Court Southern District of Texas FILED

OCT 2 9 2019

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

CRIMINAL NO. B-19-978

JOEL HAYDEN SCHRIMSHER

· VS.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE Explosive Materials-Willfully Making a Threat (18 USC 844(e))

On or about May 30, 2019, in the Southern District of Texas, the defendant,

JOEL HAYDEN SCHRIMSHER,

through the use of an instrument of interstate and foreign commerce, that is, internet communications on a personal Twitter account, did willfully make a threat, concerning an attempt, alleged attempt to be made, and to be made, to unlawfully damage and destroy a building and real property, namely, a Federal Reserve Building, by means of fire and an explosive.

In violation of Title 18, United States Code, Section 844(e).

COUNT TWO

False Information and Hoaxes (18 USC 1038)

On or about May 30, 2019, in the Southern District of Texas, the defendant,

JOEL HAYDEN SCHRIMSHER,

through internet communications on a personal Twitter account, did intentionally engage in conduct with an intent to convey false and misleading information under circumstances where such information may reasonably have been believed and which indicated that an activity had taken, was taking, and would take place, that would constitute a violation of Chapter 40, Title 18 United States Code, to wit, **JOEL HAYDEN SCHRIMSHER** falsely claiming that he was going to mail a bomb to the Federal Reserve.

In violation of Title 18, United States Code, Section 1038(a)(1).

<u>COUNT THREE</u> Explosive Materials-Willfully Making a Threat (18 USC 844(e))

On or about June 5, 2019, in the Southern District of Texas, the defendant,

JOEL HAYDEN SCHRIMSHER,

through the use of an instrument of interstate and foreign commerce, that is, internet communications on a personal Twitter account, did willfully make a threat, concerning an attempt, alleged attempt to be made, and to be made, to unlawfully damage and destroy a building and real property, namely, a Mosque, by means of fire and an explosive.

In violation of Title 18, United States Code, Section 844e.

COUNT FOUR False Information and Hoaxes (18 USC 1038)

On or about June 5, 2019, in the Southern District of Texas, the defendant,

JOEL HAYDEN SCHRIMSHER,

through internet communications on a personal Twitter account, did intentionally engage in conduct with an intent to convey false and misleading information under circumstances

where such information may reasonably have been believed and which indicated that an activity had taken, was taking, and would take place, that would constitute a violation of Chapter 40, Title 18 United States Code, to wit, **JOEL HAYDEN SCHRIMSHER** falsely claiming that he was going to set fire to a Mosque.

In violation of Title 18, United States Code, Section 1038(a)(1).

COUNT FIVE Explosive Materials-Willfully Making a Threat (18 USC 844(e))

On or about June 5, 2019, in the Southern District of Texas, the defendant,

JOEL HAYDEN SCHRIMSHER,

through the use of an instrument of interstate and foreign commerce, that is, internet communications on a personal Twitter account, did willfully make a threat, concerning an attempt, alleged attempt to be made, and to be made, to unlawfully damage and destroy a building and real property, namely, a Synagogue, by means of fire and an explosive.

In violation of Title 18, United States Code, Section 844e.

COUNT SIX False Information and Hoaxes (18 USC 1038)

On or about June 5, 2019, in the Southern District of Texas, the defendant,

JOEL HAYDEN SCHRIMSHER,

through internet communications on a personal Twitter account, did intentionally engage in conduct with an intent to convey false and misleading information under circumstances where such information may reasonably have been believed and which indicated that an activity had taken, was taking, and would take place, that would constitute a violation of

Chapter 40 and 44, Title 18 United States Code, to wit, **JOEL HAYDEN SCHRIMSHER** falsely claiming that he was going to shoot up a Synagogue.

In violation of Title 18, United States Code, Section 1038(a)(1).

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK UNITED STATES ATTORNEY

AODY L. YOUNG

Assistant United States Attorney

OSCAR PONCE

Assistant United States Attorney